

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

IN RE: AREA CODE 515 RELIEF PLAN	DOCKET NO. SPU-99-22
---	----------------------

ORDER ON REQUESTS FOR RECONSIDERATION

(Issued March 30, 2000)

On February 24, 2000, the Utilities Board (Board) issued in this docket an “Order Approving Geographic Split To Provide Numbering Plan Relief For the 515 Area Code,” directing that the existing 515 area code should be split, one half keeping 515 and the other half receiving a new area code, later determined to be 641. In the order, the Board specifically requested comment on the implementation schedule, which provided for permissive dialing beginning on June 1, 2000, and mandatory dialing on September 1, 2000. (During the permissive dialing period, a call to the new area code will be completed regardless of whether the caller dialed 515 or 641. After the mandatory implementation date, however, calls dialed using the 515 prefix and intended for a 641 customer will be connected to a recording telling the caller that the area code for that number has been changed to 641.)

In the petition that initiated this docket, the 515 telephone industry recommended a permissive dialing date of June 1, 2000, and a mandatory dialing date of November 1, 2000. While the docket was pending, the 515 area code entered jeopardy status, meaning the remaining supply of central office codes was no longer adequate to satisfy the predicted demand through the projected mandatory

relief date. As a result, on December 1, 1999, the North American Numbering Plan Administrator (NANPA) began rationing central office codes. Under the current rationing plan, developed through industry consensus, each carrier can receive a maximum of three central office codes per month, and only seven central office codes are made available each month to the entire industry. If requests are received for more than seven codes in a single month, the codes will be rationed among the requesting carriers.

The Board decided to accelerate the industry-recommended implementation schedule primarily because of the potential anti-competitive impact of an extended rationing period. As long as central office codes are being rationed, new CLECs may not be able to enter markets in the 515 area code as quickly as they otherwise would. The Board decided to shorten the implementation schedule in order to shorten the rationing period. However, the Board specifically requested comments on the shortened schedule, since there was nothing in the record to indicate whether an abbreviated schedule would present any unusual difficulties.

Formal requests for reconsideration were received from U S WEST Communications, Inc. (U S West), U S Cellular Corporation (U S Cellular), and GTE Midwest Incorporated (GTE). All three of these parties ask the Board to extend the implementation schedule, and one of them asks the Board to re-draw the new area code boundary line in order to leave one or more additional exchanges in the 515 area code. Informal requests for reconsideration were received from numerous other interested persons. All of the informal requests seek to re-draw the new boundary, usually to include one or more additional exchanges in the new 515 area.

SUMMARY OF REQUESTS FOR REHEARING

A. Proposals to Delay the Implementation Schedule

U S West states that the permissive dialing date of June 1, 2000, is too early to allow for development of a customer education program, that it allows insufficient time to change billing and other systems, and that U S West's efforts to meet the June 1 date are hampered by the fact that many of the same company resources are required to implement another area code split in Minnesota, which has been in process for several months. For these reasons, U S West asks that the permissive implementation date be delayed to August 20, 2000¹. U S West also asks that both of the implementation dates be moved to Sundays so that the customer impacts from any unintentional system disruptions can be minimized.

U S West also asks that the permissive dialing period be extended from three months (under the current schedule) to six months. U S West argues that business customers throughout the nation will need to reprogram systems to recognize and route calls to the new 641 area code. Moreover, telephone directories currently in production will include inaccurate area code information for some time into the future; an extended schedule will allow more time to minimize this problem. Burglar alarm companies and fire alarm systems will also benefit from additional time to reprogram automatic dialers. Finally, U S West argues that customers in exchanges

¹ The Board notes that U S West was involved in the industry meetings that resulted in the petition in this docket, which included an industry recommendation that permissive dialing begin on June 1, 2000. U S West does not explain why it no longer supports the implementation date it agreed to at an earlier stage of this proceeding.

with local calling areas that are split by the new line will need more extensive customer education, which will require additional time.

U S West notes that the extended schedule it has proposed may require that NANPA review the existing central office code rationing scheme and revise it to accommodate the new mandatory implementation date.

U S Cellular asks the Board to delay the permissive dialing date to September 1, 2000, and the mandatory dialing date to March 1, 2001. U S Cellular states that it serves approximately one-half of all wireless customers in Iowa, including over 50,000 in the new 641 area code. Most, if not all, of those customers will have to bring their telephones to a U S Cellular location for reprogramming. U S Cellular says it would be a significant burden to inform and schedule reprogramming for that many customers, a problem that will be exacerbated by the rural nature of the service territory. U S Cellular believes its proposed schedule would be more “customer friendly.”

U S Cellular also suggests the possibility of giving an extended implementation period to wireless carriers only. U S Cellular cites the Board to a Wisconsin Public Service Commission order (attached to U S Cellular’s pleading as Exhibit A) in which the Wisconsin Commission gave wireless carriers an additional two years to implement a split. However, the Board notes that the Wisconsin Commission specifically finds that an extended permissive dialing period for wireless service providers “may be reasonable ***provided that it is not of a duration to put area code relief in jeopardy.***” (Order at pp. 21-22, emphasis added.) Given that

the 515 area code is already in jeopardy, the Board finds the Wisconsin order is not applicable to the instant situation.

GTE asks that the mandatory implementation date be moved back to November 1, 2000, consistent with the original telephone industry recommendation. GTE states that it has determined that the new area code line will split ten existing and three proposed EAS routes, along with numerous Local Calling Plan routes². GTE now says that these split local calling areas will require additional customer education efforts and that mandatory implementation on November 1, 2000, will give adequate time for those efforts.

B. Boundary Line Modification Requests

U S West was the only party filing a formal request for reconsideration that also sought modification of the new area code boundary line. U S West asks that the Prairie City, Martinsdale, Macksburg, Peru, and Iowa Falls exchanges be moved to the 515 area code. The only reason U S West gives for this request is that some local calls for customers in those exchanges would require dialing ten digits if the line is not moved.

ANALYSIS

A. Implementation Schedule

The parties make a good case for extending the permissive dialing period in order to allow more time for customer education and to reduce the problem with

² In GTE's December 3, 1999, response to the questions in the Board's November 5, 1999, order in this docket, GTE specifically states that it has "no EAS routing problems associated with the proposed splits." GTE offers no explanation for its failure to identify these EAS routes in response to a specific Board request for that information.

inaccurate telephone directories. The Board continues to believe that the current jeopardy situation, with rationing of central office codes, is potentially a barrier to entry by any major CLEC, but no CLEC has come forward to support that position. Given the lack of evidence of harm on the CLEC side and the clear case for improved customer education on the other side, the Board will delay and extend the permissive dialing period in order to permit more time for customer education and for companies like U S Cellular to re-program equipment.

The Board agrees with U S West and U S Cellular that the permissive dialing date should be delayed beyond June 1, 2000, although the Board does not agree it should be pushed back to late August or early September. There are good arguments against delaying the permissive dialing date at all; June 1 was the original industry recommendation in the petition filed July 22, 1999, and the Board's earlier order did not accelerate this part of the schedule. Both U S West and U S Cellular have had ample opportunity to plan for permissive dialing on June 1, 2000, and it could be argued that the current jeopardy situation should not be extended just to give them more time now.

However, the early feedback from the Customer Education Committee established in this docket tends to support the U S West argument that there is not enough time between now and June 1, 2000, to permit development and implementation of a good education campaign. Therefore, the Board will delay the permissive dialing date to July 9, 2000 (the first Sunday after the 4th of July).

This will require extension of the mandatory dialing date, as well. The Board is not persuaded that the mandatory dialing date should be extended several months

past the industry-recommended date of November 1, 2000. Such an extension would add an equal number of months to the jeopardy situation, which may impede or prevent competitive entry (but may not inconvenience U S West or U S Cellular, given their existing supplies of telephone numbers).

Instead, the Board will delay mandatory implementation to give a permissive dialing period of five months, meaning the mandatory dialing date will be December 3, 2000. Moving the mandatory implementation date to the first Sunday in December will give a longer period for permissive dialing without unduly extending the current jeopardy situation.

B. Boundary Modifications.

U S West was the only party to formally request modification of the new area code boundary line. The only reason offered by U S West in support of its request is that, using the line adopted by the Board, customers in the Prairie City, Martinsdale, Macksburg, Peru, and Iowa Falls exchanges will have to dial ten digits to make some local calls. (The calls will continue to be local for billing purposes.) This rationale would apply to many of the exchanges located along the 641 side of the new boundary line. If all of those exchanges were moved into the 515 area code, it might create imbalanced projected lives for the 515 and 641 area codes. The projected life for the 641 area code would be increased, but the life of the 515 area code would be shortened, and it would be more likely that the Board would have to undertake additional area code relief measures for the 515 area code in the near future. The Board will not make the large-scale realignments requested by U S West.

Moreover, moving the line would create a new set of “boundary” exchanges, some of which would probably have the same problem with ten-digit dialing for some local calls. Any new area code boundary is likely to split some local calling areas, some school districts, some counties, some economic development zones, etc. The Board believes that once the area code boundary has been announced, it should not be modified unless the customers of an exchange or the telephone company serving an exchange can show a compelling reason that distinguishes their situation from the other boundary exchanges. No such showing has been made in any of the formal requests for reconsideration.

However, in written requests and telephone communications, some of the customers in the Prairie City exchange have attempted to distinguish their situation from the circumstances prevailing in other exchanges along the new border. Those customers informed Board staff that Prairie City was recently selected as the location for a regional calling center because it has local, seven-digit calling into the Des Moines area. They also stated that they have two similar prospects considering Prairie City for the same reason. The Prairie City customers argue that they will lose these economic development opportunities if they are split off from the 515 area code because it will be necessary to dial ten digits to make a local call to Des Moines.

The Board will reject all of the requested area code boundary modifications, with one exception: the Prairie City exchange. That exchange will be moved from the 641 area code to the 515 area code, because of the unusual situation described above.

ORDERING CLAUSES

IT IS THEREFORE ORDERED:

1. The geographic split adopted by the Board in this docket on February 24, 2000, and shown on Attachment A to that order, is hereby modified to move the Prairie City exchange from Area A to Area B. The revised map is attached hereto as Attachment B.
2. The schedule for implementing the geographic split in the 515 area code is revised as follows: The permissive dialing period shall begin on July 9, 2000, and the mandatory dialing period shall begin on December 3, 2000.
3. All other requests for reconsideration of the Board's February 24, 2000, order in this docket are denied.

UTILITIES BOARD

/s/ Allan T. Thoms

/s/ Susan J. Frye

ATTEST:

/s/ Raymond K. Vawter, Jr.

Executive Secretary

/s/ Diane Munns

Dated at Des Moines, Iowa, this 30th day of March, 2000.

Iowa 515 NPA with
New 641 NPA
3-24-00 Variation A



NPA 515

NPA 641

Map Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

